

**U.S. District Court  
District of Columbia (Washington, DC)  
CIVIL DOCKET FOR CASE #: 1:19-cv-02781-RDM**

PROTECT DEMOCRACY PROJECT, INC.  
Assigned to: Judge Randolph D. Moss  
Cause: 05:552 Freedom of Information Act

Date Filed: 09/17/2019  
Jury Demand: None  
Nature of Suit: 895 Freedom of Information Act  
Jurisdiction: U.S. Government Defendant

**Plaintiff**

**PROTECT DEMOCRACY PROJECT, INC.**

represented by **Michael Patrick Abate**  
KAPLAN & PARTNERS LLP  
710 W. Main St.  
4th Floor  
Louisville, KY 40202  
(502) 540-8280  
Email: [mabate@kplouisville.com](mailto:mabate@kplouisville.com)  
**ATTORNEY TO BE NOTICED**

**Plaintiff**

**NEGAR MORTAZAVI**

represented by **Michael Patrick Abate**  
(See above for address)  
**ATTORNEY TO BE NOTICED**

**Plaintiff**

**NARGES BAJOGHLI**

represented by **Michael Patrick Abate**  
(See above for address)  
**ATTORNEY TO BE NOTICED**

**Plaintiff**

**MOHAMMAD ALI SHABANI**

represented by **Michael Patrick Abate**  
(See above for address)  
**ATTORNEY TO BE NOTICED**

**Plaintiff**

**ESFANDYAR BATMANGHELIDJ**

represented by **Michael Patrick Abate**  
(See above for address)  
**ATTORNEY TO BE NOTICED**

**Plaintiff**

**TRITA PARSI**

represented by **Michael Patrick Abate**  
(See above for address)  
**ATTORNEY TO BE NOTICED**

V.

**Defendant**

**U.S. DEPARTMENT OF STATE**

represented by **Diana Viggiano Valdivia**  
U.S. ATTORNEY'S OFFICE FOR THE  
DISTRICT OF COLUMBIA  
555 Fourth Street, NW  
Washington, DC 20530  
(202) 252-2545  
Email: [diana.valdivia@usdoj.gov](mailto:diana.valdivia@usdoj.gov)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

Date Filed	#	Docket Text
09/17/2019	<u>1</u>	COMPLAINT against U.S. DEPARTMENT OF STATE ( Filing fee \$ 400 receipt number 0090-6381822) filed by PROTECT DEMOCRACY PROJECT, INC.. (Attachments: # <u>1</u> Exhibit Group Request, # <u>2</u> Exhibit Mortazavi Request, # <u>3</u> Exhibit Group Acknowledgment, # <u>4</u> Exhibit Mortazavi Acknowledgment, # <u>5</u> Civil Cover Sheet, # <u>6</u> Summons)(Abate, Michael) (Entered: 09/17/2019)
09/17/2019	<u>2</u>	LCvR 26.1 CERTIFICATE OF DISCLOSURE of Corporate Affiliations and Financial Interests by PROTECT DEMOCRACY PROJECT, INC. (Abate, Michael) (Entered: 09/17/2019)
09/19/2019		Case Assigned to Judge Randolph D. Moss. (zeg) (Entered: 09/19/2019)
09/19/2019	<u>3</u>	SUMMONS (1) Issued Electronically as to U.S. DEPARTMENT OF STATE. (Attachment: # <u>1</u> Notice and Consent)(zeg) (Entered: 09/19/2019)
09/19/2019	<u>4</u>	STANDING ORDER: The parties are hereby ORDERED to comply with the directives set forth in the attached Standing Order. See document for details. Signed by Judge Randolph D. Moss on 9/19/19. (lcrdm1, ) (Entered: 09/19/2019)
10/15/2019	<u>5</u>	ENTERED IN ERROR. . . .REQUEST FOR SUMMONS TO ISSUE <i>with revised address</i> filed by NEGAR MORTAZAVI, PROTECT DEMOCRACY PROJECT, INC., ESFANDYAR BATMANGHELIDJ, MOHAMMAD ALI SHABANI, NARGES BAJOGHLI, TRITA PARSI.(Abate, Michael) Modified on 10/16/2019 (ztd). (Entered: 10/15/2019)
10/16/2019		NOTICE OF ERROR re <u>5</u> Request for Summons to Issue; emailed to mabate@kplouisville.com, cc'd 1 associated attorneys — The PDF file you docketed contained errors: 1. Please refile document, 2. The Executive Office is not listed as a party. If they are being served on behalf of the defendant (ztd, ) (Entered: 10/16/2019)
11/01/2019	<u>6</u>	NOTICE of Appearance by Diana Viggiano Valdivia on behalf of U.S. DEPARTMENT OF STATE (Valdivia, Diana) (Entered: 11/01/2019)
11/01/2019	<u>7</u>	ANSWER to Complaint by U.S. DEPARTMENT OF STATE.(Valdivia, Diana) (Entered: 11/01/2019)